REMARKS

This Amendment is filed in response to the Office Action dated February 13, 2003, which has a shortened statutory period set to expire May 13, 2003.

Entry Of New Abstract

Applicants have amended the Abstract to be less than 150 words. No new matter is added. Therefore, Applicants request entry of the new Abstract.

Applicants' Claims Particularly Point Out And Distinctly Claim The Subject Matter

Applicants respectfully traverse the rejection of Claims 1-29 as being indefinite. Specifically, the preamble appropriately claims a method of supporting code development. As taught by Applicants, a zero-footprint remotely hosted phone application development environment allows a developer to use a standard computer (without any specialized software) in combination with a telephone to develop sophisticated phone applications. Specification, page 4, lines 10-13. The developer can advantageously use a telephone to call the application on the remotely hosted development environment. Specification, page 5, lines 4-6. In this manner, the developer can immediately test the application while it is being developed. Specification, page 5, lines 4-6.

Applicants submit that the recited steps relate to supporting the development of code. Therefore, Applicants request reconsideration and withdrawal of the rejection of Claims 1-29 as being indefinite.

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Belanger Fails To Disclose Applicants' Invention As Recited In Claims 1, 2, and 4-9

Applicants respectfully traverse the rejection of Claims 1, 2, and 4-9 as being anticipated by Belanger.

Claims 1 and 7 recite in part:

associating the phone application code with a telephone number for communicating with the telephone interface; and

responsive to receiving a telephone call via the number, executing the phone application code and presenting the audio output over the telephone interface.

Belanger fail to disclose or suggest these limitations. Specifically, Belanger teach different types of Web authoring, site management, and communication software technology. Paragraph 7. The system of Belanger resides entirely on an Internet Web Server site and interacts with users via conventional programming languages written for a universal protocol. Paragraph 7. An exemplary client device in the system could be an Internet telephone. Paragraph 13. In Belanger, a user can use a Web browser to register for access to one or more applications. Paragraph 34. The user can then modify or rearrange his desktop configuration, e.g. customize the size, shape, or arrangement of icons that permit access to the applications. Paragraph 34. Once registered in the system, the user can log in and access any of the applications for which he is registered. Paragraph 35. Of importance, Belanger fails to teach anything regarding a phone application code and its execution.

As taught by Applicants, a zero-footprint remotely hosted phone application development environment allows a developer to use a standard computer (without any specialized software) in combination with a telephone to develop sophisticated phone applications. Specification, page 4, lines 10-13. The

developer can advantageously use a telephone to call the application on the remotely hosted development environment. Specification, page 5, lines 4-6. In this manner, the developer can immediately test the application while it is being developed. Specification, page 5, lines 4-6.

Because Belanger fails to disclose or suggest the recited phone application code and its execution using the telephone interface, Applicants request reconsideration and withdrawal of the rejection of Claims 1 and 7.

Claims 2 and 4-6 depend from Claim 1, and therefore are patentable for at least the same reasons as Claim 1. Based on those reasons, Applicants request reconsideration and withdrawal of the rejection of Claims 2 and 4-6. Similarly, Claims 8 and 9 depend from Claim 7, and therefore are patentable for at least the same reasons as Claim 7. Based on those reasons, Applicants request reconsideration and withdrawal of the rejection of Claims 8-9.

Belanger And House Fail To Disclose Or Suggest Applicants' Invention As Recited In Claim 3

Applicants respectfully traverse the rejection of Claim 3 as being unpatentable over Belanger in view of House. Claim 3 depends from Claim 1 and therefore is patentable for at least the reasons presented for Claim 1. House fails to remedy the deficiencies of Belanger.

Specifically, House teaches a network environment with a remote user obtaining help from a help desk technician. Col. 4, lines 28-29. To assist in debugging of an application, House allows the help desk technician to establish a connection with the application. Col. 4, lines 41-44. Of importance, House also fails to disclose or suggest a phone application, its execution, presenting an audio output over the telephone

interface, and debugging the phone application code. Therefore, Applicants request reconsideration and withdrawal of the rejection of Claim 3.

Belanger and Kredo Fail To Disclose Or Suggest Applicants'
Invention As Recited In Claims 10-14 and 28

Applicants respectfully traverse the rejection of Claims 10-14 and 28 as being unpatentable over Belanger in view of Kredo.

Claims 10 and 28 recite in part:

associating the phone application code with
a telephone number for communicating with the
telephone interface using the reference; and
responsive to receiving a telephone call
via the telephone number, executing the phone
application code and presenting an audio output
over the telephone interface and presenting a
call flow to the remote computer over the
network computer.

Belanger fail to disclose or suggest these limitations for substantially the same reasons as those presented for Claims 1 and 7. Kredo fails to remedy the deficiencies of Belanger. Specifically, Kredo teaches a telephone announcement system that includes a directory assistance subsystem and a URL computer. Col. 1, lines 64-66. In this system, after a caller dials 411, a directory assistance subsystem assumes control of the call. Col. 4, lines 12-14. This subsystem, using either an operator or voice recognition equipment, acquires the desired subscriber phone number passes that number and control of the call to the URL computer. Col. 4, lines 15-17. The URL computer establishes the datapath to the URL site, which includes announcement audio signals that the caller can respond to. Col. 4, lines 18-25. After the caller responds to the signals, the URL computer hands control of the call back to the directory

assistance subsystem, which in turn connects the call. Col. 4, lines 29-35.

Because Belanger and Kredo fail to disclose or suggest the development of the phone application code and its execution using the telephone interface, Applicants request reconsideration and withdrawal of the rejection of Claims 10 and 28.

Claims 11-14 depend from Claim 10, and therefore are patentable for at least the same reasons as Claim 10. Based on those reasons, Applicants also request reconsideration and withdrawal of the rejection of Claims 11-14.

Belanger, Kredo, And House Fail To Disclose Or Suggest
Applicants' Invention As Recited In Claims 15-22, 24-27, and 29

Applicants respectfully traverse the rejection of Claims 15-22, 24-27, and 29 as being unpatentable over Belanger in view of Kredo and House.

Claim 15 recites in part:

> responsive to receiving the URI, sending a first message to the phone application platform using the first computer system, the first message corresponding to a request to make the phone application located at the URI available on the phone application platform at a telephone number; and
> upon receiving a request from the second computer system on the first computer system, presenting to the second computer a debugging information generated by calls to the telephone number for the phone application on the phone application platform.

Belanger fail to disclose or suggest these limitations. Specifically, Belanger teach different types of Web authoring, site management, and communication software technology. Paragraph 7. The system of Belanger resides entirely on an Internet Web Server site and interacts with users via

conventional programming languages written for a universal protocol. Paragraph 7. An exemplary client device in the system could be an Internet telephone. Paragraph 13. In Belanger, a user can use a Web browser to register for access to one or more applications. Paragraph 34. The user can then modify or rearrange his desktop configuration, e.g. customize the size, shape, or arrangement of icons that permit access to the applications. Paragraph 34. Once registered in the system, the user can log in and access any of the applications for which he is registered. Paragraph 35. Of importance, Belanger fails to teach anything regarding a phone application and presenting debugging information generated by calling a telephone number for the phone application on the phone application platform.

Kredo fails to remedy the deficiencies of Belanger. Specifically, Kredo teaches a telephone announcement system that includes a directory assistance subsystem and a URL computer. Col. 1, lines 64-66. In this system, after a caller dials 411, a directory assistance subsystem assumes control of the call. Col. 4, lines 12-14. This subsystem, using either an operator or voice recognition equipment, acquires the desired subscriber phone number passes that number and control of the call to the URL computer. Col. 4, lines 15-17. The URL computer establishes the datapath to the URL site, which includes announcement audio signals that the caller can respond to. Col. 4, lines 18-25. After the caller responds to the signals, the URL computer hands control of the call back to the directory assistance subsystem, which in turn connects the call. Col. 4, lines 29-35. Thus, Kredo also fails to teach anything regarding a phone application and presenting debugging information generated by calling a telephone number for the phone application on the phone application platform.

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House fails to remedy the deficiencies of Belanger and Kredo. Specifically, House teaches a network environment with a remote user obtaining help from a help desk technician. Col. 4, lines 28-29. To assist in debugging of an application, House allows the help desk technician to establish a connection with the application. Col. 4, lines 41-44. Of importance, House also fails to disclose or suggest a phone application, much less a request to make the phone application located at the URI available on the phone application platform at a telephone number.

As taught by Applicants, a zero-footprint remotely hosted phone application development environment allows a developer to use a standard computer in combination with a telephone to develop sophisticated phone applications. Specification, page 4, lines 10-13. The developer can advantageously use a telephone to call the application on the remotely hosted development environment. Specification, page 5, lines 4-6. In this manner, the developer can immediately test the application while it is being developed. Specification, page 5, lines 4-6. Note that this debugging can advantageously be performed with a help desk technician, as desired by House.

Because Belanger, Kredo, and House fail to disclose or suggest the development of the phone application and presenting debugging information generated by calling a telephone number for the phone application on the phone application platform, Applicants request reconsideration and withdrawal of the rejection of Claim 15.

Claims 16-22 and 24-27 depend from Claim 15, and therefore are patentable for at least the same reasons as Claim 15. Based on those reasons, Applicants also request reconsideration and withdrawal of the rejection of Claims 16-22 and 24-27.

Claim 29 recites in part:

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> means for sending a first message to a
> phone application platform to the receiving the
> URI, the first message corresponding to a
> request to make the phone application located at
> the URI available on the phone application
> platform at a telephone number; and
> means for presenting to the second computer
> a call flow information generated by calls to
> the telephone number for the phone application
> on the phone application platform.

Belanger, Kredo, and House fail to disclose or suggest these limitations for substantially the same reasons as those presented for Claim 15. Based on those reasons, Applicants request reconsideration and withdrawal of the rejection of Claim 29.

Belanger, Kredo, House And Curreri Fail To Disclose Or Suggest Applicants' Invention As Recited In Claim 23

Applicants respectfully traverse the rejection of Claim 23 as being unpatentable over Belanger in view of Kredo, House, and Curreri. Claim 23 depends from Claim 15 and therefore is patentable for at least the reasons presented for Claim 15. Curreri fails to remedy the deficiencies of Belanger, Kredo, and House. Specifically, Curreri also fails to teach anything regarding a phone application and presenting debugging information generated by calling a telephone number for the phone application on the phone application platform. Therefore, Applicants request reconsideration and withdrawal of the rejection of Claim 23.

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CONCLUSION

Claims 1-29 are pending in the present Application.
Applicants respectfully request allowance of these claims.

If there are any questions, please telephone the
undersigned at 408-451-5907 to expedite prosecution of this
case.

Respectfully submitted,

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with the United States Postal Service as FIRST CLASS MAIL in
an envelope addressed to: BOX NON-FEE AMENDMENT, Assistant
Commissioner for Patents, Washington, D.C., 20231, on April
21, 2003.

4/21/03
Date

Signature

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